

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**UNITED STATES OF AMERICA ex rel.  
CAMERON JEHL,**

**Plaintiffs,**

**v.**

**GGNSC SOUTHAVEN LLC D/B/A  
GOLDEN LIVING CENTER-  
SOUTHAVEN et al.**

**Defendants.**

Case No. 3:19cv091-GHD-JMV

**DEFENDANTS' RESPONSE IN OPPOSITION TO PLAINTIFF-RELATOR'S MOTION  
TO ENFORCE SETTLEMENT AGREEMENT AND DISTRIBUTE THE APPEAL BOND  
FUNDS IN THE COURT'S REGISTRY IN ACCORDANCE WITH THE SETTLEMENT**

Defendants GGNSC Southaven LLC, GGNSC Administrative Services LLC, and GGNSC Clinical Services LLC ("Defendants") respectfully submit their Joint Response in Opposition to Plaintiff-Relator's Motion to Enforce Settlement Agreement and Distribute the Appeal Bond Funds in the Court's Registry in Accordance with the Settlement.

The Motion is supported by the following exhibit and the supporting Memorandum of Law filed herewith:

**Exhibit 1** – Declaration of Robert Salcido in Support of Defendants' Response in Opposition to Plaintiff-Relator's Motion to Enforce Settlement Agreement and Distribute the Appeal Bond Funds in the Court's Registry in Accordance with the Settlement.

Wherefore, Defendants respectfully request that the Court deny Plaintiff-Relator's Motion to Enforce Settlement Agreement and Distribute the Appeal Bond Funds in the Court's Registry in Accordance with the Settlement.

Date: September 26, 2024

Respectfully submitted,

/s/ Margaret Sams Gratz

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**GGNSC Southaven LLC; GGNSC**

**Administrative Services LLC; GGNSC**

**Clinical Services LLC**

**CERTIFICATE OF SERVICE**

This is to certify that I, Robert Salcido, one of the attorneys for GGNSC Southaven, LLC individually and on behalf of all Defendants have this day furnished a true and correct copy of the above and foregoing **DEFENDANTS' RESPONSE IN OPPOSITION TO PLAINTIFF-RELATOR'S MOTION TO ENFORCE SETTLEMENT AGREEMENT AND DISTRIBUTE THE APPEAL BOND FUNDS IN THE COURT'S REGISTRY IN ACCORDANCE WITH THE SETTLEMENT** to the following via ECF filing:

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This 26th day of September 2024.

/s/ Robert Salcido